

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

The Estate of ANGEL L. RIVERA,

Plaintiff,

v.

Civil Action No. 04-10810 NG

**SUNBRIDGE HEALTH CARE
CORPORATION, D/B/A, SUNBRIDGE CARE
& REHABILITATION FOR WOOD MILL,**

Defendants

**JOINT MOTION TO EXTEND TIME TO
FILE MOTIONS PURSUANT TO FED R. CIV. P. 15**

NOW COMES the Plaintiff, the Estate of Angel L. Rivera, and hereby states:

1. A Scheduling Order was issued on or about July 17, 2004, which incorporated the Parties' proposed Discovery Plan in their Joint Statement.
2. The Order included the Parties' agreement that Motions pursuant to Fed. R. Civ. P. 15 would be filed by September 24, 2004.
3. The Parties submitted the case to mediation on or about September 8, 2004 and are working on a proposal for statement for all pending claims.
4. The Plaintiff needs an additional two weeks to determine whether amendments are necessary.
5. Counsel for the DefendantS have been notified and assent to this Motion.

WHEREFORE, the Plaintiff prays this Honorable Court extend the time for filing Motions in accordance with Fed. R. Civil P. 15 to October 8, 2004.

Respectfully submitted,
The Estate of Angel Rivera
By its attorney,

/s/ Michele N. Struffolino

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ASSENTED TO

Sunbridge Healthcare Corporation,
d/b/a, Sunbridge Care & Rehabilitation
for Wood Mill
By its attorneyS,

/s/ Michael Williams

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Dated: September 23, 2004